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VIA ECF

Honorable Harvey Bartle III, U.S.D.J.
United States District Court for the
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106

Re: *Atlas Data Privacy Corp., et al v. The Lifetime Value Co. LLC, et al.* (No. 1:24-cv-04850-HB)
Joinder to Briefs in Opposition to Plaintiffs' Motion to Remand.

Dear Judge Bartle:

This Firm represents The Lifetime Value Co. LLC, BeenVerified, LLC, NeighborWho LLC, The NumberGuru, LLC, PeopleLooker LLC, PeopleSmart LLC, Ownerly, LLC (the "Defendants") in the above-referenced matter. We write to advise the Court that Defendants joined the Consolidated Brief In Opposition to Plaintiffs' Consolidated Motion to Remand [Docs. 53-54] filed in the action captioned *Atlas Data Privacy Corporation v. Carco Group, Inc.*, No. 24-cv-4077. By way of this letter, Defendants hereby memorialize their joinder to the Supplemental Opposition to Plaintiffs' Consolidated Motion for Remand filed in the following action: *Atlas Data Privacy Corp. v. Blackbaud, Inc.*, No. 24-cv-3993, Docs. 59-61.

For the reasons in the aforementioned submissions, Defendants respectfully request this Court deny Plaintiffs' Motion to Remand.¹

Respectfully submitted,

/s/ Christopher A. Rojao

Christopher A. Rojao

cc: All counsel of record (via ECF)

¹ Pursuant to the Court's prior orders, we expressly preserve and do not waive any additional defenses.